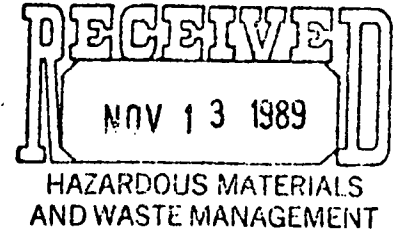




2350 W. 112th Avenue
Northglenn, Colorado 80234
Phone (303) 451-1289

November 8, 1989



Environmental Restoration Office
United States Department of Energy
Rocky Flats Office
P.O. Box 464
Golden, CO 80402-0464

Dear Sirs:

The City of Northglenn has the following comments on the Proposed Interim Measures/Interim Remedial Action Plan and Decision Document for the 881 Hillside Area as presented by the Department of Energy (DOE). The following comments are based upon a review of Volume 1.

I would like to thank the Colorado Department of Health, DOE, and Rockwell International for the opportunity to submit these comments. Overall the preferred option that is detailed in the report is acceptable. The diligence that Rockwell International has shown in effecting a solution for Hillside 881 is encouraging. It is hoped that efforts of this caliber can continue to be the standard operating policy of the Rocky Flats facility.

The UV/Peroxide and ion exchange treatment systems are the appropriate solution due to complete destruction of contaminants and low volume of by-products. The french drain collection system has a proven track record of success and is the best system for collection of the groundwater. Following are the specific comments related to the document and the proposed plan.

Pages 3-8 indicate the ARAR for Nitrate (10mg/l) is exceeded with a maximum value of 55 mg/l. The discussion on pages 2-15 does not include Nitrate as exceeding an ARAR.

It is unclear why the french drain system does not include SWMU 119.2. SWMU 119.2 should be included in the coverage by the french drain.

A detailed operating procedure should be developed that outlines such items as influent monitoring, effluent monitoring, discharge guidelines, and other criteria for treatment.

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A plan detailing facility oversight should be developed. In the interest of Public Relations, an outline of who will have oversight for the project and who will have the ultimate responsibility to decide if the effluent is acceptable for discharge.

The concern of return flow to Woman Creek is unfounded. The ultimate discharge would be more acceptable out of a drinking water supply basin. While the system is designed for today's standards with current technology, there are still several unknowns. The contamination has not been 100% defined and future standards and technology may change. These unknowns justify the water being diverted away from the Woman Creek drainage. If return volume is deemed necessary by the regulatory agencies, then this water volume should be made up with water outside of the Rocky Flats treatment process.

The data for operation from this facility (unless the water is contained on plant site) should become part of monthly Information Exchange meetings.

We appreciate this opportunity to comment on the proposed plan. We hope dialogue can continue to be productive and that a workable solution can be implemented in the proposed time frame.

Sincerely,



Kipp E. Scott
Laboratory Supervisor

KS/mr

xc: Tom Ambalam
Annette Barnard, City of Thornton
Dave Kaunisto, City of Westminster
David Shelton, Director ✓
Hazardous Materials and Waste Management Div.
Colorado Department of Health